

UNITED STATES DISTRICT COURT

for the

Eastern District of California

FILED

Jan 28, 2025

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

United States of America

v.

MAURICE COLLINS,

Case No.

2:25-mj-0018 AC

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 28, 2025 in the county of Sacramento in the
Eastern District of California, the defendant(s) violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

/s/ Thomas Wiebold

Complainant's signature

Thomas Wiebold, DEA Special Agent

Printed name and title

Sworn to me and signed via telephone.

Date: January 28, 2025

City and state: Sacramento, California

Allison Claire

Judge's signature

Allison Claire, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT OF DEA SPECIAL AGENT THOMAS WIEBOLD IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Thomas Wiebold, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an arrest warrant and Criminal Complaint charging Maurice COLLINS with felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1), on January 28, 2025, in Sacramento County, California.

2. I am a Special Agent (“SA”) with the Drug Enforcement Administration (“DEA”) and have been since April 2022. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. I am a graduate of the seventeen-week DEA Basic Agent Training Academy in Quantico, Virginia. This training included instruction in the investigation of illicit drug trafficking, including, but not limited to, investigating criminal violations of 21 U.S.C. §§ 841 and 846 and 18 U.S.C. § 922(g)(1). I have received comprehensive, formalized instruction in drug identification, detection, and interdiction, financial investigations and money laundering, informant handling, law classes, report writing, seizure and forfeiture of drug-related assets, undercover operations, and electronic and physical surveillance procedures. In furtherance of my training as a Special Agent, I have also received specialized instruction in cyber/dark net investigations, financial investigations, illicit hazardous environments/drug manufacturing laboratories, high-risk warrant service, Title III wire intercepts, license plate recognition technology, informant management, drug cartel culture, narcoterrorism, cryptocurrency, and cell phone digital evidence. My post-academy education in drug investigations totals over 290 hours of specialized training.

4. The facts and information set forth herein are based upon my personal knowledge and observations, observations of other law enforcement personnel, observations of cooperating

individuals as related to me and other law enforcement personnel, my review of investigative reports, and discussions with other federal, state, and local law enforcement officials. Where I describe statements made by other people (including other agents and law enforcement officers), the statements are described in sum, substance, and relevant part. Similarly, where I describe information contained in reports and other documents or records in this affidavit, this information is also described in sum, substance, and relevant part. This affidavit is intended to show only that there is sufficient probable cause for the requested Complaint and does not set forth all of my knowledge about this matter.

II. PROBABLE CAUSE

5. From November 2023 to present, the Sacramento DEA, in partnership with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), has been investigating Kevin PARKER, John PARKER, Veronica BROOKS, Xavier SURITA, Devon NELSON, Raymundo ESCOBAR, Marcelino ESCOBAR, and others for distributing controlled substances and firearms in the Eastern District of California; as charged in 2:25-MJ-00016-CKD and 2:25-CR-00015-TLN.

6. During the investigation, law enforcement identified 3078 MLK Jr. Blvd., Sacramento, CA as a stash house where Maurice COLLINS lived. Law enforcement completed multiple controlled purchases of methamphetamine and firearms from K. PARKER and his associates at or near 3078 MLK Jr. Blvd. during the investigation.

7. Sacramento Municipal Utilities District (“SMUD”) records show that the utilities at 3078 MLK Jr. Blvd. are in the name of “Maurice Collins.” Further, a Sacramento County law enforcement database known as WebKPF shows that COLLINS resides at 3078 MLK Jr. Blvd. and has since approximately May 2021. WebKPF records also show that COLLINS is a validated Oak Park Bloods gang member.

8. On January 28, 2025, law enforcement executed a federal search warrant at 3078 MLK Jr. Blvd. Inside, law enforcement officers identified and detained Maurice COLLINS. Law enforcement further identified that COLLINS was the occupant of a bedroom within the

residence by locating mail and documents addressed to COLLINS, prescription pill bottles prescribed to COLLINS, and COLLINS's cell phone laying on the bed. I confirmed COLLINS's cell phone by calling the number (916) 533-7619, which I know SMUD has listed as COLLINS's phone number for 3078 MLK Jr. Blvd. I also know that this phone number has been in contact with Kevin PARKER. Law enforcement further located suspected crack cocaine inside a shoe, as well as a loaded Taurus PT111 Millenium G2 with serial number TKY12438 underneath the mattress of COLLINS's bed.

9. Based on finding the suspected drugs and firearm, I arrested COLLINS for violating 18 U.S.C. § 922(g)(1). Sacramento Police Department subsequently transported COLLINS to Sacramento County Jail. DEA agents field tested the suspected crack cocaine, which tested positive for the presence of cocaine.

10. ATF Special Agent Payton Smith, who is trained as an ATF interstate nexus expert, reviewed photos of the firearm and, based on his training and experience, believes that the firearm was manufactured outside of the state of California. Further, I saw the firearm and observed that it says, "Made in Brazil."

11. I am aware that COLLINS has previously been convicted of the following felony offenses that are punishable by more than one year in prison:

- a) Concealed carry weapon: crim. street gang, in violation of Cal. Penal Code § 12025(b)(3), on or about May 8, 2009, in Sacramento County, California;
- b) Poss. of narc/controlled substance, in violation of Cal. Health & Safety Code § 11350(A), on or about April 11, 2012, in Sacramento County, California;
- c) Felon in possession of a firearm, in violation of Cal. Penal Code § 29800(a)(1), on or about February 2, 2017, in Sacramento County, California.
- d) Evade peace officer: disregard safety, in violation of Cal. Vehicle Code § 2800.2(A), on or about September 30, 2018, in Sacramento County, California.

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III. CONCLUSION AND AUTHORIZATION REQUEST


12. Based on the foregoing, I respectfully request this Court issue an arrest warrant and Criminal Complaint charging COLLINS with one count of felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,

/s/ Thomas Wiebold

Thomas Wiebold
Special Agent
Drug Enforcement Administration

Subscribed and sworn to me telephonically on: January 28, 2025


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

/s/ Emily G. Sauvageau

Approved as to form by AUSA EMILY G. SAUVAGEAU